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April 22, 2022

Via ECF

USDC SDNY
DOCUMENT
ELEÇTRONICALLY FILED
DOC #:
DATE FILED: 4/22/22

Hon. Barbara Moses
U.S. Magistrate Judge
U.S. Courthouse
500 Pearl Street
New York, N.Y. 10007

## MEMO ENDORSED

Re: Madeline Lugo Rosado v. Kijakazi 21 Civ. 623 (JPC) (BCM)

Dear Judge Moses:

I have just agreed to represent Ms. Rosado in this adult SSI disability case. I filed my notice of appearance earlier today.

Ms. Rosado's response to the Commissioner's motion for judgment on the pleadings is due on Monday, April 25, 2022. I would like to request the following revised briefing schedule:

Plaintiff would file her cross-motion for judgment on the pleadings by June 24, 2022.

The Commissioner would file her reply by July 15, 2022.

Plaintiff would file the reply on her cross-motion by August 5, 2022.

The Commissioner is not opposed to this request.

Thank you for considering it.

Very truly yours

James M. Baker

JMB/jb

cc: Joseph Pantoja, AUSA

Tel: 212-979-0505 Fax: 212-979-8778 jbaker623@aol.com Application GRANTED IN PART. Plaintiff's crossmotion for judgment on the pleadings shall be filed no later than May 25, 2022. Defendant's reply shall be filed no later than June 15, 2022. Plaintiff's reply shall be filed no later than July 6, 2022. I am not unsympathetic to plaintiff's counsel's plight. However, because this action is before me on referral from the district judge, for report and recommendation, I must also consider my obligation to deliver that report and recommendation in a timely manner. Under these circumstances, I cannot grant the full extension sought. SO ORDERED.

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Barbara Moses United States Magistrate Judge April 22, 2022